

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

JANE DOE 1, individually, and on behalf of all  
others similarly situated, JANE DOE 2, individually,  
and on behalf of all others similarly situated, JANE  
DOE 3, individually, and on behalf of all others  
similarly situated, JANE DOE 4, individually, and  
on behalf of all others similarly situated, JANE DOE  
5, individually, and on behalf of all others similarly  
situated, and JANE DOE 6, individually, and on  
behalf of all others similarly situated,

Plaintiffs,

v.

GOVERNMENT OF THE UNITED STATES  
VIRGIN ISLANDS, FIRST LADY CECILE DE  
JONGH, GOVERNOR KENNETH MAPP,  
SENATOR CELESTINO WHITE, ATTORNEY  
GENERAL VINCENT FRAZER, GOVERNOR  
JOHN DE JONGH, SENATOR CARLTON DOWE,  
DELEGATE STACEY PLASKETT, and JOHN  
DOES 1-100,

Defendants.

---

CIVIL ACTION NO.  
1:23-cv-10301-AS

JURY TRIAL DEMANDED

**DEFENDANT CONGRESSWOMAN STACEY PLASKETT'S ANSWER TO  
PLAINTIFFS' SECOND AMENDED COMPLAINT**

DUANE MORRIS, LLP

Eric R. Breslin

Melissa S. Geller

1540 Broadway

New York, New York 10036-4086

212-692-1000

erbreslin@duanemorris.com

msgeller@duanemorris.com

*Attorneys for Congresswoman Stacey Plaskett*

Defendant Stacey Plaskett (“Plaskett”) answers Plaintiffs’ Second Amended Complaint as follows:

1. Paragraph 1 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 1 are denied.

**I. JURISDICTION, VENUE, AND TIMELINESS**

2. Paragraph 2 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 2 are denied.

3. Paragraph 3 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 2 are denied.

4. Defendant Stacey Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of the allegations set forth in Paragraph 4 and therefore denies such allegations. All remaining allegations are denied.

5. The referenced communications speak for themselves and all characterizations of those communications are denied. Defendant Stacey Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of the allegations set forth in Paragraph 5 and therefore denies such allegations.

6. Paragraph 6 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 6 are denied. Defendant Stacey Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of the remainder of the allegations set forth in Paragraph 6 and therefore denies such allegations.

7. Paragraph 7 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 7 are denied.

8. Paragraph 8 and each subpart contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 8 are denied.

Defendant Stacey Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of the remaining allegations set forth in Paragraph 8 and therefore denies such allegations. To the extent any further response is required, all remaining allegations are denied.

9. Paragraph 9 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 9 are denied.

10. Paragraph 10 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 10 are denied.

11. Paragraph 11 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 11 are denied.

12. As concerns allegations against Defendant Stacey Plaskett, the allegations are denied. Defendant Stacey Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of the remainder of the allegations set forth in Paragraph 12 and therefore denies such allegations.

13. Paragraph 13 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 13 are denied.

## **II. INTRODUCTION**

14. Paragraph 14 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 14 are denied.

15. As concerns allegations against Plaskett, the allegations are denied. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of the remainder of the allegations set forth in Paragraph 15 and therefore denies such allegations.

16. Denied.

17. Denied.

18. Denied.

19. Denied.

20. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

21. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

22. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

23. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

### **III. PARTIES**

24. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

25. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

26. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

27. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

28. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

29. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

30. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

31. Denied.

32. Denied.

33. Denied.

34. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

35. Denied.

36. Paragraph 36 contains legal conclusions to which no response is required. To the extent a response is required, the allegations are denied.

37. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

38. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

39. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

40. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

41. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

42. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

43. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

44. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

45. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

46. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

47. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

48. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

49. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

50. Admitted to the extent that Plaskett served as the General Counsel for the Virgin Island Economic Development Authority (“the VIEDA”) from approximately 2007 to 2012 and has served in the United States House of Representatives since 2015. All remaining allegations are denied.

51. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

52. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

53. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

54. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

55. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

56. Paragraph 56 contains legal conclusions to which no response is required. Any remaining allegations are denied.

57. Denied.

58. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

#### **IV. FACTS OF THE CASE**

59. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

60. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

61. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

62. Denied.

63. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

64. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

65. Denied.

66. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

67. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

68. Paragraph 68 contains legal conclusions to which no response is required. To the extent a response is required, the allegations are denied.

69. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

70. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

71. Plaskett denies the allegations as to her. As to the remaining allegations, Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

72. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

73. Denied.

74. Denied.

75. Denied.

76. Denied.

77. Denied.



78. Denied.

79. Denied.

80. Denied as to any allegations directed to Plaskett. As to the remaining allegations, Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

81. Denied.

82. Denied.

83. Denied.

84. Denied.

85. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

86. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

87. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

88. Denied.

89. Denied.

90. Denied.

91. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

92. Denied.

93. Denied.

94. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

95. Denied.

96. Denied.

97. To the extent this allegation purports to implicate Plaskett, the allegation is denied. As to the remaining allegations, Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

98. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

99. To the extent this allegation purports to implicate Plaskett, the allegation is denied. As to the remaining allegations, Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

100. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

101. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

102. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

103. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

104. To the extent this allegation purports to implicate Plaskett, the allegation is denied. As to the remaining allegations, Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

105. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

106. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

107. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

108. Denied.

109. To the extent this allegation purports to implicate Plaskett, the allegation is denied. As to the remaining allegations, Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

110. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

111. Denied.

112. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

113. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

114. Denied.

115. Denied.

116. Denied.

117. Paragraph 117 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 117 are denied.

118. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

119. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

120. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

121. Denied.

122. Denied.

123. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

124. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

125. Denied.

126. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

127. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

128. Denied.

129. Denied.

130. Denied.

131. Denied.

132. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

133. Denied as to Plaskett. As to any remaining allegations, Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

134. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

135. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

136. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

137. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

138. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

139. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

140. Denied.

141. Denied.

142. Denied.

143. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

144. Denied.

145. Denied.

146. Denied.

147. Denied.

148. The referenced communications speak for themselves, and all characterizations of those communications are denied. Any remaining allegations are denied.

149. Denied.

150. Denied.

151. Denied.

152. Denied.

153. Denied.

154. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

155. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

156. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

157. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

158. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

159. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

160. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

161. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

162. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

163. Denied.

164. Denied.

165. Denied.

166. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

167. Denied.

168. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

169. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

170. Denied.

171. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

172. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

173. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

174. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

175. Denied.

176. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

177. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

178. Denied as to allegations directed to Plaskett. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of any remaining allegations. Any remaining allegations are denied.

#### **V. CLASS ACTION ALLEGATIONS**

179. Denied.

180. No response is required to this allegation. To the extent a response is required, the allegation is denied.

181. Denied.

182. Denied.

183. Denied.

184. Paragraph 184 and all subparts are denied.

185. Denied.

186. Denied.

187. Denied.

188. Denied.

189. Denied.

190. Denied.

#### **VI. CAUSES OF ACTION**



**COUNT ONE**

191. No response is required to Paragraph 191.

192. Denied.

193. Denied.

194. Denied.

195. Denied.

196. Denied.

197. Denied.

198. Denied.

199. Denied.

200. Paragraph 200 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 200 are denied.

201. Denied.

202. Denied.

203. Denied.

204. Denied.

205. Denied.

206. Denied.

207. Denied.

208. The SAC speaks for itself. Any remaining allegations are denied.

209. Denied.

210. Denied.

211. Paragraph 211 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 211 are denied.

212. Paragraph 212 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 212 are denied.

213. Paragraph 213 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 213 are denied.

214. No response is required to Paragraph 214.

**COUNT TWO**

215. No response is required to Paragraph 215.

216. Denied.

217. Denied.

218. Denied..

219. Denied.

220. Denied.

221. Denied.

222. Denied.

223. Denied.

224. Denied.

225. Denied.

226. Denied.

227. Denied.

228. Denied.

229. Denied.

230. Denied.

231. Denied.

232. Denied.

233. Denied.

234. Denied.

235. Denied.

236. Denied.

237. Denied.

238. Paragraph 238 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 238 are denied.

239. Paragraph 239 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 239 are denied.

240. Paragraph 240 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 240 are denied.

### **COUNT THREE**

241. No response is required to Paragraph 241.

242. Denied.

243. Denied.

244. The referenced documents speak for themselves. All remaining allegations are denied.

245. Denied

246. Denied.

247. Denied.

248. Denied.

249. Denied.

250. Denied.

251. Denied.

252. Denied.

253. Denied.

254. Denied.

255. Denied.

256. Denied.

257. Denied.

258. Denied.

259. Denied.

#### **COUNT FOUR**

260. Paragraphs 260 – 269 purport to state a RICO offense, which was dismissed by the Court. No response is required to these paragraphs. Any allegations to which a response is required are denied.

#### **COUNT FIVE**

300. No response is required to Paragraph 300.

301. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

302. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

303. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

304. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

305. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

306. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

307. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

308. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

309. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

310. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

311. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

312. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. All remaining allegations are denied.

313. Denied.

314. Denied.

315. Denied.

316. Denied.

317. Denied.

318. Plaskett lacks knowledge or information sufficient to form a belief as to the veracity of these allegations. Any remaining allegations are denied.

319. Denied.

320. Denied.

321. Denied.

322. Denied.

323. Denied.

324. Denied.

325. Denied.

326. Denied.

327. Denied.

328. Denied.

329. Denied.

330. Denied.

331. Denied.

332. Denied.

333. Denied.

334. Denied.

335. Denied.

336. Denied.

337. Denied.

338. Denied.

339. Denied.

340. Denied.

341. Denied.

342. Denied.

343. Denied.

344. Denied.

345. Denied.

346. Paragraph 346 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 346 are denied.

347. Paragraph 347 contains legal conclusions to which no response is required. To the extent a response is required, the allegations in Paragraph 347 are denied.

## **VII. ANSWER TO THE REQUEST FOR RELIEF**

348. Defendant Stacey Plaskett denies that Plaintiffs are entitled to any damages or relief sought in Paragraph 348 of the Second Amended Complaint or to any other relief.

Defendant Stacey Plaskett denies each and every allegation in the Second Amended Complaint not specifically admitted herein.

### **FIRST AFFIRMATIVE DEFENSE**

Plaintiffs' fail to state a claim on which relief may be granted.

### **SECOND AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the principle of sovereign immunity and qualified immunity.

### **FOURTH AFFIRMATIVE DEFENSE**

The Court lacks personal jurisdiction over Stacey Plaskett.

**FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the statute of limitations.

**SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the doctrines of laches and *res judicata*.

WHEREFORE, Defendant Stacey Plaskett prays for judgment as follows:

1. Plaintiffs take nothing on their Second Amended Complaint, that the Second Amended Complaint be dismissed with prejudice, and that judgment be entered for Stacey Plaskett.
2. That Defendant Stacey Plaskett be awarded her costs of suit; and
3. That the Court grant such further relief as the Court may deem just and proper.

Dated: April 4, 2025

By: /s/ Eric. R. Breslin

Eric R. Breslin

Melissa S. Geller

**Duane Morris LLP**

A DELAWARE LIMITED LIABILITY PARTNERSHIP

1540 Broadway

New York, New York 10036-4086

212-692-1000

erbreslin@duanemorris.com

msgeller@duanemorris.com

*Attorneys for Congresswoman Stacey Plaskett*